

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Alexander Boston,

Plaintiff,

Docket No.

-against-

Notice of Petition for Removal

Samuel Doshna and Young Judea Camp Tel
Yehuda, Inc.,

Defendants.

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**TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

1. On August 4, 2022, a Summons and Complaint was filed in the Supreme Court of the State of New York, County of New York, and thereafter served upon defendant, Samuel Doshna, on August 12, 2022 at his home at 197 Main Street, Flemington, New Jersey 08822. The index number previously procured by plaintiff is 156533/2022. No further proceedings have been had herein.

2. The above-described action is a civil action for which the Court has jurisdiction under 28 U.S.C. §1332(a)(1) and is one which may be removed to this Court by the Petitioner/Defendant herein pursuant to the provision of 28 U.S.C. §1441.

3. Plaintiff alleges in his complaint that he is a resident of the State of Connecticut. A copy of the Summons and Complaint is annexed hereto as Exhibit "A." The Court's jurisdiction is based upon diversity of citizenship, 28 U.S.C. Section 1332 in that the Plaintiff and all Defendants are citizens of different states. Plaintiff, Alexander Boston resides at 78 Lyons Place, Weston, CT 06883; Defendant Samuel Doshna resides at 197 Main Street, Flemington, New Jersey 08822; and, Defendant Young Judea Camp Tel Yehuda, Inc. is located at 575 Eighth Avenue in New York, New York 10018.

4. Moreover, upon information and belief, the amount in controversy exceeds \$75,000.00. I understand the claim includes damages allegations that plaintiff was injured when he was 15 years old and that the injury included a fracture of his femur that required surgery to repair. It is also believed that the femur injury also included nerve damage that the plaintiff will claim is a permanent injury.

5. Petitioner/Defendant will pay all costs and disbursements incurred by reason of the removal proceedings hereby brought should it be determined that this action is not removable or is improperly removed.

6. Venue in the Southern District of New York is proper pursuant to 28 U.S.C. Section 112 and 28 U.S.C. Section 1391(a).

WHEREFORE, Petitioner prays that the above action now pending against it in the Supreme Court of the State of New York, County of New York be removed therefrom to the United States District Court for the Southern District of New York in accordance with 28 U.S.C. Sections 1441 and 1446.

Dated: Farmingdale, New York
September 9, 2022

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